

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiff

vs.

HECTOR SANCHEZ-MORALES

Defendant

Crim. No. 19-155 (DRD)

MOTION REQUESTING LEAVE TO REPLY

TO THE HONORABLE COURT:

Comes now defendant, through the undersigned counsel, and respectfully states and prays:

1. On April 2, 2019 the government filed its response in opposition to defendant's request for information regarding the identity of the purported victim in this case.

2. The government's response misconceives defendant's request which it incorrectly casts as a demand for the name of the government's witnesses without regard to Mr. Sánchez right to present a defense to the charges against him. In so doing, the government misses the point of the case law cited by

defendant substantiating his request as per his constitutional rights to compulsory process and confrontation.

3. The government's submission also denotes a mistaken understanding of the obligations imposed on the prosecution under *Brady v. Maryland*, 373 U.S. 83 (1963), and subsequent case law.

4. Defendant understands that a reply to the government's response is necessary. Accordingly, he requests that he be granted leave to submit a reply brief within the next twenty (20) days.

WHEREFORE, it is respectfully requested that this Honorable Court grant defendant leave to submit a reply to the government's response in opposition to its request for information within the next twenty days.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3rd day of April 2019.

ERIC A. VOS, Esq.
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